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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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AZ CORP COMMISSION
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CARL J. KUNASEK

Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

DOCKETED BY

IN THE MATTER OF THE APPLICATION
OF TUCSON ELECTRIC POWER
COMPANY FOR APPROVAL OF ITS
STRANDED COST RECOVERY AND FOR
RELATED APPROVALS,
AUTHORIZATIONS AND WAIVERS

DOCKET NO. E-01933A-98-0471

IN THE MATTER OF THE FILING OF
TUCSON ELECTRIC POWER COMPANY
OF UNBUNDLED TARIFFS PURSUANT
TO A.A.C. R14-2-1602 *et seq.*

DOCKET NO. E-01933A-97-0772

IN THE MATTER OF THE COMPETITION
IN THE PROVISION OF ELECTRIC
SERVICES THROUGHOUT THE
STATE OF ARIZONA

DOCKET NO. RE-00000C-94-0165

APPLICATION FOR INTERVENTION

Pursuant to Ariz. Admin. Code R14-3-105 of the Rules of Practice and Procedure of the Arizona Corporation Commission ("Commission"), and the Hearing Officer's Procedural Order entered June 23, 1999, Arizona Public Service Company ("APS") hereby applies for leave to intervene in the above-captioned docket.

APS is an Arizona corporation with its principal office in the Phoenix, Arizona. It owns and operates facilities for the generation, purchase, transmission, distribution and sale of electricity to customers in various areas of the state.

APS is a participant in Docket No. RE-00000C-94-0165.

Snell & Wilmer

L.L.P.

LAW OFFICES

One Arizona Center

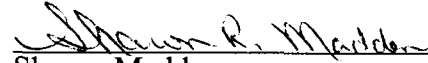
Phoenix, AZ 85004-0001

(602) 382-6000

Snell & Wilmer
L.L.P.
LAW OFFICES
One Arizona Center
Phoenix, AZ 85004-0001
(602) 382-6000

CERTIFICATE OF SERVICE

The original and ten (10) copies of the foregoing document were filed with the Arizona Corporation Commission on this 2nd day of July, 1999, and service was completed by mailing or hand-delivering a copy of the foregoing document this 2nd day of July, 1999, to all parties of record herein.


Sharon Madden

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APS may be directly and substantially affected by the issuance of any orders or decisions in this proceeding because APS is an Affected Utility under the Retail Electric Competition Rules pursuant to AAC. R14-2-1601, *et seq.*

APS's intervention will not unduly broaden the issues of this proceeding.

The name, mailing address and telephone number of the person upon whom service of all pleadings, motions and other documentation is to be made is:

Steven M. Wheeler
Snell & Wilmer, LLP
One Arizona Center
Phoenix, AZ 85004
(602)382-6327
(602)382-6070 (fax)

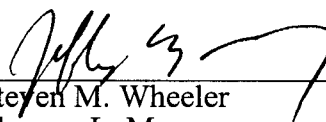
and

Barbara J. Klemstine
Arizona Public Service Company
400 North 5th Street
Phoenix, Arizona 85072-3999
(602)250-2031
(602)250-3399 (fax)

RESPECTFULLY SUBMITTED this 20 day of July, 1999.

SNELL & WILMER L.L.P.

By


Steven M. Wheeler
Thomas L. Mumaw
Jeffrey B. Guldner

Attorneys for Arizona Public Service
Company